IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

KENNETH REYNOLDS and)	
JOAN CHIEN, husband and wife,)	
)	
Plaintiffs,)	
)	
v .)	C.A. No.: 07-CV-176
)	
STATE FARM MUTUAL AUTOMOBILE)	
INSURANCE COMPANY,)	
)	
Defendant.)	

NOTICE OF RECORDS DEPOSITION

TO: Albert M. Greto, Esquire
Law Offices of Albert M. Greto
1701 Shallcross Avenue, Suite C
P.O. Box 756
Wilmington DE 19899-0756
Attorneys for Plaintiffs

Shelly Farber, Esquire 2619 West Chester Pike Broomall, PA 19008 Attorneys for Plaintiffs

PLEASE TAKE NOTICE, that the undersigned attorney will take the oral deposition of the below-identified individual, on Friday, March 21, 2008, at 10:00 a.m., in the offices of Tybout, Redfearn & Pell, 750 S. Madison Street, Suite 400, Wilmington, DE 19801.

Custodian of Records Lincoln General Insurance Company c/o Insurance Commissioner 841 Silver Lake Blvd Dover, DE 19903

TYBOUT, PEDFEARN & PELL

THERRY RUGGIERO FALLON (ID#:2464)
750 S. Madison Street, Suite 400

P.O. Box 2092

Wilmington, DE 19899-2092

(302) 658-6901

Attorneys for Defendant

Dated: 3/4/08

DUCES TECUM: Deponent is required to bring with him/her: The COMPLETE underwriting and commercial liability claims file(s) for the following claim, including, but not limite to, correspondence, recorded statements, damage appraisals, investigative materials, medical records, diagnostic tests, IME reports, notes (handwritten or otherwise), summaries, bills, payment transmittals, surveillance recordings, photographs, etc., and all documents, correspondence, or communications relating to settlement, including but not limited to, a complete copy of the executed settlement agreement, regarding an accident which occurred on July 3, 2002, involving insured, Northstar Services, Ltd., Policy #PAP LTC 100298

(Personal appearance is waived if documents are provided on or before Friday, March 21, 2008)

CERTIFICATE OF SERVICE

I, SHERRY RUGGIERO FALLON, hereby certify that I have had caused to be served by First Class U.S. Mail, on this of March, 2008, two (2) true and correct copies of the attached documents addressed to:

Albert M. Greto, Esquire Law Offices of Albert M. Greto 1701 Shallcross Avenue, Suite C P.O. Box 756 Wilmington DE 19899-0756 Attorneys for Plaintiffs

Shelly Farber, Esquire 2619 West Chester Pike Broomall, PA 19008 Attorneys for Plaintiffs

TYBOUT, REDFEARN & PELL

SHERRY RUGGIERO FALLON

(ID# \2464)

750 S. Madison St., Suite 400 P.O. Box 2092

Wilmington, DE 19899-2092

(302)658-6901

Attorney for Defendant